

**Before the
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554**

In the Matter of)	
)	WC Docket No. 13-150
Application of Verizon New Jersey Inc. and)	Comp. Pol. File No. 1115
Verizon New York Inc. to Discontinue Domestic)	
Telecommunications Services)	

COMMENTS OF ALCATEL-LUCENT

Alcatel-Lucent submits these comments in support of the above captioned Application of Verizon New Jersey Inc. and Verizon New York Inc. (collectively “Verizon”) to discontinue provision of interstate wireline telecommunications services in limited parts of New York and New Jersey where copper facilities were destroyed or rendered inoperable by Superstorm Sandy and where the new deployment of wireline facilities is impractical (the “Verizon Application”).

Alcatel-Lucent is the trusted transformation partner of communications service providers, enterprises, and strategic industries worldwide, providing solutions to deliver voice, data and video communications services to end-users. A leader in fixed, mobile and converged broadband networking, IP and optics technologies, applications and services, Alcatel-Lucent leverages the unrivaled technical and scientific expertise of Bell Labs, a leading innovator in the communications industry. With our unrivaled experience in developing and deploying evolving technologies for wireline networks and wireless networks, Alcatel-Lucent is well-positioned to comment on the ongoing technology transitions in the telecommunications industry.

The Verizon Application presents an unusual situation where a natural disaster destroyed the copper plant to certain distinct geographies in New York and New Jersey. Due to flooding and severe weather patterns, any attempt to restore the copper plant to those areas would be temporary as they are susceptible to repeated damage and outages.¹ Taking into account climate and terrain concerns, Verizon has determined that a wireless service, “Verizon Voice Link,” is the best choice to restore voice service to the affected areas.² As part of the transition, Verizon bolstered its wireless network in the affected areas to provide a more reliable, resilient and easier to restore service to its customers.³

The Verizon Application must be viewed in the context of the transition to an all-IP environment already underway across the U.S. As the market for TDM-based voice service continues to erode, the challenge of operating and maintaining legacy platforms uniquely tied to TDM to relatively few remaining subscribers becomes increasingly financially burdensome. Indeed, in the areas at issue in the Verizon Application, prior to Superstorm Sandy, the vast majority of voice traffic already traveled over wireless networks, rather than the existing copper plant.⁴

Understanding this market reality, the Commission is seeking comment in several proceedings on how best to facilitate these ongoing technological transitions, including consideration of the regulatory framework that will apply to an all-IP environment.⁵ Against this backdrop of regulatory reform, which ideally will result an all-IP environment independent of

¹ Verizon Application at 2, 4.

² *Id.*

³ See Tom Maguire, *Verizon Policy Blog, Setting the Record Straight on Fire Island and Voice Link*, available at <http://publicpolicy.verizon.com/blog/entry/setting-the-record-straight-on-fire-island-and-voice-link> (visited July 18, 2013).

⁴ *Id.*

⁵ See e.g., Public Notice, *Pleading Cycle Established on AT&T and NTCA Petitions*, GN Docket No. 12-353, DA 12-1999 (rel. Dec. 14, 2012); Public Notice, *Technology Transitions Policy Task Force Seeks Comment on Potential Trials*, GN Docket No. 13-5, DA 13-1016 (rel. May 10, 2013).

specific communications network access technologies, requiring Verizon to rebuild copper infrastructure that, in a relatively short period of time, may no longer be required for voice services, would be imprudent and wasteful. The Commission should heed to the principal of technology neutrality and not impose technology platform-specific requirements that will be of little relevance in the rapidly approaching all-IP world.

Based on the foregoing, Alcatel-Lucent supports the Verizon Application to discontinue provision of interstate wireline telecommunications services over copper to the affected customers.

Respectfully submitted,

Alcatel-Lucent

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